

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHRISTOPHER HUNT,)	
)	
Plaintiff,)	Civil Action No. 04-12291-EFH
)	
v.)	
)	
KIMBERLY HINDEN, REGISTRAR)	
OF MOTOR VEHICLES,)	
)	
Defendant.)	

AFFIDAVIT OF ANDREW M. PADELLARO

I, Andrew M. Padellaro, hereby depose and say:

1. My name is Andrew M. Padellaro, and I am Legal Counsel to the Driver Control Unit, Registry of Motor Vehicles, Commonwealth of Massachusetts.
2. According to the Registry's records, the driver's license of Christopher Hunt was revoked pursuant to the immediate threat statute effective July 12, 2003.
3. The Registry's file notes do not indicate that Hunt ever requested a Registry hearing on said suspension until September 24, 2004.
4. The following documents attached to Defendant's Opposition to Plaintiff's Motion for Restraining Order and Preliminary Injunction are true copies of records maintained by the Registry:
 - (a) Registry's computerized records, including Hunt's driving record, file notes of Registry hearing officers, license transaction history, and notices of license suspension / revocation;
 - (b) Notice dated July 14, 2003, advising Hunt that his license had been revoked under the immediate threat statute effective July 12, 2003;
 - (c) Request for Immediate Threat License Suspension / Revocation form dated July 9, 2003, with attached Arlington Police Incident Report, in which Arlington Police request revocation of Hunt's driver's license;

(d) Registry of Motor Vehicles Immediate Threat Revocation Form dated July 9, 2003, and stamped by Hearing Officer John McAdam.

Signed under the pains and penalties of perjury this 8th day of November, 2004.



Andrew M. Padellaro
Legal Counsel, Driver Control
Unit, Registry of Motor
Vehicles, Commonwealth of
Massachusetts
One Copley Place
Boston, MA 02116